

**IN THE UNITED STATES DISTRICT
COURT FOR THE NORTHERN DISTRICT
OF ILLINOIS EASTERN DIVISION**

DECLARATION IN SUPPORT OF ATTORNEY'S FEES

Janine L. H. Hoft, an attorney admitted in the State of Illinois and Northern District of Illinois, hereby states pursuant to 28 U.S.C. § 1746:

1. I am an attorney licensed to practice in the State of Illinois since November of 1984, having graduated with honors from the Illinois Institute of Technology Chicago/Kent College of Law Juris Doctorate program in May of 1984. I am admitted to practice before the Supreme Court of the United States of America, the Court of Appeals for the Seventh Circuit, the Illinois Supreme Court, and the United States District Courts for the Northern District of Illinois, the Central District of Illinois, the Southern District of Illinois and the Northern District of New York.

2. I have continuously been engaged in the active practice of law since 1984 and have been a partner at the Peoples Law Office since 1985. My practice has consistently specialized in civil rights litigation, particularly in the areas of police misconduct and employment discrimination. I have been involved in approximately fifteen jury trials and as sole counsel in numerous non-jury trials and administrative hearings. I have negotiated many six and seven figure settlements.

3. From August of 1994 through August of 1997, I was a visiting assistant professor of law with the Office of Clinical Programs at the Syracuse University College of Law in Syracuse, New York. During that time period I was the director of the Public Interest Law Firm supervising student work on cases involving public interest, law reform and criminal justice issues, including class actions, and litigating in federal, state and administrative agency jurisdictions. I specifically supervised students drafting complaints, negotiating settlements, litigating cases brought in federal court pursuant to Title VII and 42 U.S.C. § 1983, as well as representing victims of police misconduct in hearings before a civilian review board. My responsibilities also included planning and teaching weekly seminars on lawyering, trial skills and substantive law issues within the area of civil rights.

4. The People's Law Office has specialized in civil rights litigation for over 30 years and has represented hundreds of victims of government misconduct. The People's Law Office has represented many individuals over the years who were falsely arrested, maliciously prosecuted, wrongfully convicted of serious criminal offenses and subjected to abuse in detention facilities. The PLO has also litigated many significant civil rights cases, including involving excessive force, false arrest, malicious prosecution, conspiracy, qualified immunity and law enforcement misconduct, policy, custom and practices matters. See, e.g., **Buckley v. Fitzsimmons**, 509 U.S. 259 (1993); **Soldal v. Cook County**, 506 U.S. 56 (1992); **Miranda v. Cty. of**

Lake, 900 F. 3d 335 (7th Cir. 2018); **Avery v. City of Milwaukee**, 847 F. 3d 433 (7th Cir. 2017); **Vodak v. City of Chicago**, 639 F.3d 738 (7th Cir. 2011); **Doe v. City of Chicago**, 360 F.3d 667 (7th Cir. 2004); **Burgess v. Lowery**, 201 F.3d 942 (7th Cir. 2000); **Sledd v. Lindsay**, 102 F.3d 282 (7th Cir. 1996); **Wilson v. City of Chicago**, 6 F.3d 1233 (7th Cir. 1993); **Wilson v. City of Chicago**, 120 F.3d 681 (7th Cir. 1997); **Jones v. City of Chicago**, 856 F.2d 985 (7th Cir. 1988), **Hampton v. Hanrahan**, 600 F.2d 600 (7th Cir. 1979).

5. I have over 35 years of experience litigating civil rights cases. I have participated in federal civil rights appeals and trials, obtained numerous favorable verdicts and settlements for my clients, and I am currently litigating numerous federal civil rights cases in this and other districts.

6. I was also a member of the Board of Directors of the National Police Accountability Project (NPAP) of the National Lawyers Guild for more than ten years. NPAP is a nationwide association of lawyers specializing in civil rights and police misconduct litigation.

7. I have become personally aware of the experience, expertise and reputation of attorney Irene Dymkar through one-on-one discussions of legal issues and cases with her as well as other lawyers and direct review and observation of her legal work. She is an experienced, competent and zealous advocate.

8. Through my career as a civil rights attorney, through litigating my own fee petitions and through monitoring fees litigation of my law partners as well as the of the plaintiffs' civil rights bar, I have specific and personal knowledge of reasonable prevailing rates of civil rights attorneys whose dates of graduation include from the years 1969 to 2008. I am aware of the prevailing rate for civil rights attorneys who have expertise and experience comparable to Irene Dymkar. I am also aware of the reasonable and actual billing rates of such attorneys.

9. Based on my experience and knowledge of reasonable attorney's Fees awarded in civil rights cases, particularly including a decision (*Delgado v. Mak*, 2009 U.S. Dist. LEXIS 6287) in which partners in my firm were awarded hourly rates for work expended in 2008 of \$325 for a 1997 law graduate (Joey Mogul), \$400 for a 1979 law graduate (John Stainthorp) and \$525 for a 1972 law graduate (G. Flint Taylor), as well as a 2019 filed fee petition (*Estate of Lyvita Gomes v. Drs. Elazegui and Singh*, 12 CV 4439), thereafter resulting in a global settlement, seeking an hourly rate of \$600 for myself and \$650 for John Stainthorp and a 1976 law graduate (Jan Susler), an hourly rate of \$525 is a very reasonable rate that reflects the current market value in the Chicago area for attorneys with expertise and experience comparable to Irene Dymkar, particularly given her unique experience in the area of civil rights litigation.

10. Further affiant sayeth naught.

I declare under penalty of perjury
under the laws of the United States
of America that the foregoing is
true and correct.

Dated this 9th day of September 2022

s/ Janine L. Hoft
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